

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER,

Plaintiff,

v.

SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION OF AMERICA,
LOCAL 556,

Defendants.

Civil Case No. 3:17-cv-02278-X

CARTER'S DEPOSITION DESIGNATIONS

Pursuant to this Court's requests and instructions at the June 16, 2022 pretrial conference, Plaintiff Charlene Carter hereby submits Deposition Designations for Sonya Lacore and Linda Rutherford.¹ Carter received copies of Rutherford's and Lacore's deposition transcripts on Wednesday, June 29, 2022 at 9:55 a.m. CT and 9:57 a.m. CT respectively.

Deposition Testimony Designation

Carter intends to call each of the witnesses designated live at trial, but, in the event their testimony cannot be secured, submits the following deposition designations:

Deposition of Sonya Lacore

7:6-20
8:4-15
8:25-9:5
9:10-22
9:23-11:4
11:5-18
11:21-25

¹ Transcript of June 16, 2022 Pretrial Conference, Tr.164:19-165:18.

12:4-16:18
17:8-14
17:15-23
19:5-20:11
20:12-23:19
24:14-22
25:3-28:22
28:23-30:8
30:11-20
31:1-18
32:10-34:13
34:23-35:14
35:18-36:22
38:11-38:25
39:10-18
39:19-41:24
41:25-48:16
48:17-49:1
49:2
49:13-20
49:22-51:8
51:17-23
53:12-15
53:16-54:18
56:22-58:7
59:22-60:2
60:3-13

Deposition of Linda Rutherford

7:4-8:3
8:11-25
10:1-17
11:1-9
12:7-10
13:22-25
14:4-6
14:8-14
15:7-10
16:6-17:2
19:25-20:14
20:18-22:15
23:2-3
23:19-21

24:5-17
25:11-17
28:6-15
28:22-29:3
29:22-30:5
30:14-18
30:22-31:5
32:11-16
32:20-24
33:4-13
33:25-34:4
35:3-5
35:11
35:23-36:4
36:16-37:19
37:25-38:16
39:8-25
40:5-11
40:22-41:3
43:11-44:9
46:18-24
47:2-9
47:17-20
47:23-48:25

DATED: June 30, 2022

Respectfully submitted,

/s/ Matthew B. Gilliam

Matthew B. Gilliam (*admitted pro hac vice*)

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**ATTORNEYS FOR PLAINTIFF
CHARLENE CARTER**

Certificate of Service

I hereby certify that on June 30, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam